

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA**

CHARLESTON DIVISION

CASE NUMBER: 2:22-cv-01531-DCN

Latisha N. Brady,

Plaintiff,

v.

Jessica Floissac and Island Style Homecare,
LLC,

Defendants.

NOTICE OF REMOVAL

**TO: THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH
CAROLINA, CHARLESTON DIVISION:**

The Defendants, Jessica Floissac and Island Style Homecare, LLC (hereinafter “Defendants”), would respectfully show in support of their Notice of Removal that:

1. This action was commenced on or about January 26, 2022 in the Court of Common Pleas for Clarendon County, South Carolina. A copy of the Plaintiff’s Summons and Complaint are attached, along with Plaintiff’s Response to Defendants’ Request for Admission, which is the basis of this Notice of Removal.

2. This action is one of a civil nature over which the District Courts of the United States have original jurisdiction, said action having been brought by the Plaintiff against the Defendants for injuries sustained in an accident.

3. The amount in controversy exceeds Seventy-Five Thousand and No/100 (\$75,000.00) Dollars, exclusive of interest and costs, all of which will more fully appear from the attached Plaintiff’s Response to Defendants’ Request for Admission; there is complete diversity of citizenship and, therefore, this Court has jurisdiction in accordance with Title 28 U.S.C. §1332(a)(1). Defendants believe the proper division of this court would be the Charleston Division.

4. Upon information and belief, at the time of the commencement of this action, the Plaintiff was a citizen and resident of the State of Georgia; the Defendant, Island Style Homecare, LLC, was a corporation organized and existing under the laws of the State of Connecticut with its principal place of business in Connecticut. The Defendant, Jessica Floissac, was a citizen and resident of the State of Connecticut. Therefore, there is diversity of citizenship between the Plaintiff and Defendants. The accident occurred in the County of Clarendon, State of South Carolina.

5. These Defendants filed an Answer in this action with the Court of Common Pleas for the State of South Carolina on March 24, 2022, and it is attached hereto for reference.

6. These Defendants have furnished to the Clerk of Court for Clarendon County a copy of this Notice of Removal.

MURPHY & GRANTLAND, P.A.

s/ Ronald B. Diegel

Ronald B. Diegel, Esquire (Federal I.D. No. 05827)

PO Box 6648

Columbia, South Carolina 29260

(803) 782-4100

Attorneys for the Defendants, Jessica Floissac and
Island Style Homecare, LLC

Columbia, South Carolina
May 13, 2022

Certificate of Service

I, the undersigned employee of the law offices of Murphy & Grantland, P.A., Attorneys for Defendants, do hereby certify that on May 13, 2022, I have served a copy of the foregoing Notice of Removal, Civil Cover Sheet, and Local Rule 26.01 Interrogatories in connection with the above-referenced case placing same in the U.S. mail, postage paid to:

James J. Kasprzycki, Esquire
Kenneth S. Nugent, PC
One Bull Street, Suite 400
Savannah, GA 31401

s/ Ronald B. Diegel
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